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UBER TECHNOLOGIES, INC.
18 and OTTOMOTTO LLC

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 WAYMO LLC,
23 Plaintiff,
24 v.
25 UBER TECHNOLOGIES, INC.,
26 OTTOMOTTO LLC; OTTO TRUCKING LLC,
27 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR
SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION TO STRIKE
VAGUE AND OVERBROAD TRADE
SECRET CLAIMS**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Portions of Their Supplemental Brief in Support of Motion to Strike Vague and Overbroad Trade Secret Claims.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Supplemental Brief in Support of Motion to Strike Vague and Overbroad Trade Secret Claims ("Supplemental Brief")	Highlighted Portions	Plaintiff (Green) Defendants (Blue)
Exhibit 1	Entirety	Plaintiff Defendants
Exhibit 2	Highlighted Portions	Plaintiff (Green)

3. The blue-highlighted portions of the Supplemental Brief and entirety of Exhibit 1 contain highly confidential information regarding the technical details of Uber's LiDAR systems, including the specifications of LiDAR transmit boards. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical components of Uber's LiDAR sensors, such that Uber's competitive standing could be significantly harmed.

4. The green-highlighted portions of the Supplemental Brief, the entirety of Exhibit 1, and the green-highlighted portions of Exhibit 2 contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties

1 have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this
2 material under seal in accordance with Paragraph 14.4 of the Protective Order.

3 5. Defendants' request to seal is narrowly tailored to the portions of the Supplemental
4 Brief and its supporting papers that merit sealing.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this
6 28th day of August, 2017 in Washington, D.C.

7
8 /s/ Michelle Yang

Michelle Yang

9
10
11 **ATTESTATION OF E-FILED SIGNATURE**

12 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
13 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
14 concurred in this filing.

15 Dated: August 28, 2017

16 /s/ Arturo J. González

ARTURO J. GONZÁLEZ